

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED STATES OF AMERICA,)	CASE NO. 1:15-CR-275
)	
Plaintiff,)	
)	JUDGE DAN AARON POLSTER
vs.)	
)	
JOHN CLEMENTS,)	<u>UNOPPOSED MOTION TO</u>
)	<u>CONTINUE CHANGE OF PLEA</u>
)	<u>HEARING</u>
Defendant.)	

Now comes the Defendant, John Clements by and through undersigned counsel, Friedman & Nemecek, L.L.C., and hereby respectfully moves this Honorable Court to continue the Change of Plea hearing currently scheduled for Friday, February 3, 2017 at 1:30 p.m. and to reschedule the matter for Monday, February 6, 2017 at 1:30 p.m.

The Defendant's parents recently informed the undersigned that they have a scheduling conflict on February 3, 2017 and are unable to attend the proceedings. The Defendant's parents have been present at all previous Court proceedings and have expressed their earnest desire to be present with the Defendant at his Change of Plea hearing. Accordingly, the Defendant respectfully requests that currently-scheduled hearing be continued so that his parents can be in attendance.

Counsel has spoken with Assistant United States Attorney Michael Sullivan regarding this request. AUSA Sullivan has informed the undersigned that he does not oppose a continuance of this matter.

The instant request is made for the above-referenced reason only and is not for purposes of undue burden or delay. It is respectfully submitted that neither party will be prejudiced by a continuance of this matter.

WHEREFORE, the Defendant respectfully moves this Honorable Court to continue the Change of Plea hearing that is presently set for Friday, February 3, 2017 at 1:30 p.m. and to reschedule the matter for **Monday, February 6, 2017 at 1:30pm.**

Respectfully Submitted,

/s/ Ian N. Friedman
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CERTIFICATE OF SERVICE

A copy of the foregoing Motion has been served electronically this 2nd day of February, 2017, on Michael Sullivan, Assistant United States Attorney, United States Courthouse, Northern District of Ohio, 801 Superior Avenue W., Suite 400, Cleveland, Ohio 44113.

/s/ Ian N. Friedman
IAN N. FRIEDMAN
Counsel for Defendant